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November 12, 2019

ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Lisa Doe v. Darren K. Indyke and Richard D. Kahn as Joint Personal
Representatives of The Estate of Jeffrey E. Epstein, et al., 1:19-cv-07773 (ER)***

Dear Judge Ramos:

We represent Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (incorrectly named herein as "Joint Personal Representatives" of the Estate of Jeffrey E. Epstein), Nine East 71st Street, Corporation, Financial Trust Company, Inc., NES, LLC, and HBRK Associates, Inc. (together, "Defendants") in the referenced action. We write to respectfully request a two week extension of Defendants' time to answer, move or otherwise respond to Plaintiff's Complaint, from November 15, 2019 to November 29, 2019. There is no Initial Pretrial Conference scheduled in this matter. The requested extension would not affect any other scheduled dates in this action. We request this short extension because motion practice at this time would be detrimental to the potential for a non-adversarial resolution of this action.

This is the first request for an extension of this deadline. The Court previously So Ordered the parties' agreement whereby we accepted service of Plaintiff's Complaint and setting the November 15 response deadline (ECF #24).

Plaintiff's counsel does not consent to this request, stating: "I cannot agree to extend your time to respond any further and cannot agree to postpone the conference." However, as explained above, this is the first request to extend the November 15 deadline; and there is no Initial Pretrial Conference scheduled in this action.

Thank you for your attention to this matter.

Respectfully submitted,

s/ Bennet J. Moskowitz
Bennet J. Moskowitz